



Allegheny Technologies Incorporated

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**SFUND RECORDS CTR
2277404**

Lauren S. McAndrews
Vice President Labor Relations
and Assistant General Counsel

VIA E-MAIL & U.S. MAIL

January 3, 2012

Keith Olinger
Enforcement Office (SFD-7-5)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Request for Information—Stringfellow Superfund Site, Riverside County, CA

Dear Mr. Olinger:

Allegheny Technologies Incorporated ("ATI") hereby responds to USEPA's November 3, 2011, Request for Information pursuant to Section 104(e) of CERCLA. Our response is provided pursuant to an extension of time granted by you. Please note that while the request was addressed to ATI, we do not believe that ATI has any liability for the Stringfellow Site since it is a holding company that does not engage in any operations. Any liability for the Site likely would be attributable to former subsidiaries or divisions of TDY Industries, Inc. k/n/a TDY Industries, LLC. As used in this letter, reference to ATI is intended to include its subsidiaries TDY Holdings, LLC and TDY Industries, LLC.

With respect to this response, nothing contained herein constitutes an admission of liability, whether stated or implied, or a waiver of ATI's right to defend against any claim that may be asserted against it. ATI asserts the following privileges, reservations of rights, and objections with regard to USEPA's November 3, 2011 information request:

(A) ATI asserts all applicable privileges it has with regard to USEPA's enumerated inquiries including the attorney-client privilege, work product privilege, the privilege related to materials generated in anticipation of litigation, and privileges for materials which are proprietary, company confidential, or trade secret;

(B) ATI objects to the requests on the grounds that the requests use undefined terms and are overbroad, vague, ambiguous, irrelevant and unduly burdensome so as to exceed statutory authority under CERCLA and contravene ATI's constitutional rights. In responding to these requests, ATI relies on the definition of these terms as they are commonly used (*i.e.*, their dictionary definitions);

(C) ATI objects to the requests on the grounds that the requests are overbroad and unduly burdensome in that they seek information or documents regarding the facilities either prior to or after ATI's ownership or occupancy of the facilities. As such, each of these requests exceeds USEPA's statutory authority under CERCLA and contravenes ATI's rights;

(D) ATI objects to any requirement to produce documents or information already in the possession of a government agency, or already in the public domain;

(E) ATI hereby disavows any obligation to supplement these responses on an ongoing basis. CERCLA Section 104(e)(2) authorizes USEPA to require submission of information upon reasonable notice. ATI conducted a review of available records that was practicable given the time period ATI had to respond to this request and has supplied all information concerning the facilities which was found during that review. If more information is desired, ATI respectfully requests further reasonable notice that such information is desired;

(F) ATI objects to USEPA's definition of "Teledyne, Inc.," "Allegheny Technologies Incorporated" and "Company" in its information request, as the terms are overbroad and it is not possible for ATI to answer questions on behalf of all persons thereby defined.

The responses given below correspond to the question number in USEPA's Request.

1. The answers provided herein were prepared by:

Lauren S. McAndrews
Vice President Labor Relations and Assistant General Counsel
1000 Six PPG Place
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I have been employed by Allegheny Technologies since March 1997.

2. Despite a diligent search of available records, we have not been able to locate any records pertaining to the site, other than materials relating to the sale of the property in 2001. Just prior to the sale, William S. Grow, an employee of Allegheny Technologies Incorporated, was involved in overseeing the buyer's environmental due diligence. Mr. Grow is no longer employed with ATI and he is believed to be living in the Rancho Cordova, CA area. We have very limited information on operations that may have been conducted on property in or near Pyrite Canyon near Glen Avon, CA, therefore, individuals responsible for environmental matters are presently unknown.

3. Identify all Teledyne entities which conducted operations within the Site.

Due to the passage of time and nature of changes within the Company, it is difficult to provide information about a company that has not operated in more than forty (40) years. Based on the very limited information that we have, it appears that McCormick Selph

operated some type of facility from 1965 to 1970 or 1971 on property in Riverside County, CA. We have not located any documents pertaining to the McCormick Selph operations that may have been conducted on property in or near Pyrite Canyon near Glen Avon, CA. McCormick Selph was a division of TDY Industries but that business was sold in 1999. TDY Industries, Inc. n/k/a TDY Industries, LLC sold land consisting of 185.91 acres to the Trust for Public Land in 2001. The property was located just north of Highway 60 at Pyrite Avenue in Riverside County, CA and had an assessor parcel number of 173-170-001, 003 and 014. All buildings were demolished many years before the sale.

4. Explain the Company's present operational status.

TDY Industries, Inc. is now known as TDY Industries, LLC. We believe that the former McCormick Selph operations were operated as a division of TDY.

5. Provide the date the Company was incorporated, formed or organized. Identify the State in which the Company was incorporated, formed, or organized.

Teledyne Industries, Inc. was a California corporation; it subsequently changed its name to TDY Industries, Inc. in 1999 and to TDY Industries, LLC a California limited liability company, on January 2, 2012.

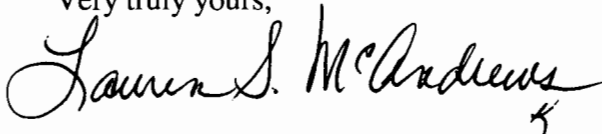
- 6-8. Documents relating to corporate formation and changes can be provided upon further request.

9. See response to item 3

- 10 – 25. Due to the passage of time and changes within the Company, we are not presently aware of any documents that are responsive to this request and have no other information to provide. Our search for relevant records is ongoing and this response will be supplemented as appropriate if further information is discovered.

If you have any questions concerning this response, please contact me.

Very truly yours,

A handwritten signature in black ink, reading "Lauren S. McAndrews". The signature is fluid and cursive, with a small flourish at the end.

Lauren S. McAndrews

LSM/kmb